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Peter Wendol kowski
04/30/2003 10:45 AM

To: Peter Wendolkowski/DC/USEPA/US@EPA
cc:
cc:
Subject: Environmental Defense comments on 1,5-Cyclooctadiene (CAS# 111-78-4)

Richard_Denison@environmentaldefense.org on 04/25/2003 09:47:18 AM

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cc: lucierg@msn.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org

Subject: Environmental Defense comments on 1,5-Cyclooctadiene (CAS# 11 I-78-4)

(Submitted via Internet 4/25/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and Edwin.L.Mongan-1@usa.dupont.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 1,5-Cyclooctadiene (CAS# 111-78-4).

This test plan prepared by DuPont deNemours Company is well-written, informative and objective. The proposed test plan recommends an additional algal toxicity test and a combined repeat dose/reproduction/development study. We agree with this proposal for further testing and we agree that the data provided are adequate for all other endpoints. Specific comments are as follows:

1. According to the sponsor, 1,5-Cyclooctadiene is manufactured at one DuPont facility and it is a co-product in the manufacture of cyclodecatriene. It is used as an intermediate in the production of a number of chemicals used as flame retardants and in rubber goods.

2. This chemical is moderately toxic to fish and mammals and is an eye and skin irritant. DuPont appears to have good workplace safety practices in place to minimize worker exposure. The 8-hr TWA AEL of 10 ppm appears reasonable, although this standard should be reevaluated after the combined repeat dose/reproductive and developmental toxicity study is completed. Exposure studies cited by the sponsor indicate that worker exposures are well below the AEL.

3. ECOSAR-generated estimates for algal toxicity are provided, but there are no available data on closely related chemicals, so we agree with the sponsor's proposal to conduct an acute algal toxicity study.

4. A 2-week inhalation study in rats which focused on neurological endpoints is available. It also included histological analysis of a number of tissues, but as the sponsor points out this study is not adequate to fulfill requirements of the HPV program. There are no reproductive or developmental studies available, so we concur with the proposal to conduct a combined reproductive/developmental/repeat dose study.

5. There are substantial and well-conducted genetic toxicity studies available that demonstrate that 1,5-cycloctadiene is not mutagenic in vitro

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or in vivo. The micronucleus studies used wide dose ranges, including high doses, so those results are especially convincing.

Thank you for this opportunity to comment.

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